1	Lexi J. Hazam LIEFF CABRASER HEIMANN & BERNSTEIN, LLP		
2	275 Battery Street, 29th Floor San Francisco, CA 94111-3339		
3	Telephone: 415.956.1000 Facsimile: 415.956.1008		
4	lhazam@lchb.com		
5	Christopher A. Seeger		
6	SEEGER WEISS, LLP 55 Challenger Road, 6 th Floor		
7	Ridgefield Park, NJ 07660		
8	Telephone: 973.639.9100 Facsimile: 973.679.8656		
9	cseeger@seegerweiss.com		
10	Previn Warren MOTLEY RICE LLC		
11	401 9th Street NW Suite 630		
12	Washington DC 20004 Telephone: 202.386.9610		
13	pwarren@motleyrice.com		
14	Co-Lead Counsel for Plaintiffs		
15	IN THE UNITED STATES DISTRICT COURT		
16	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
17			
18	IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY	No. 4:22-MD-3047	
19	PRODUCTS LIABILITY LITIGATION	MDL No. 3047	
20		DECLARATION OF LEXI J. HAZAM IN	
21	This Document Relates to:	SUPPORT OF ADMINISTRATIVE MOTION TO CONSIDER WHETHER	
22	ALL ACTIONS	THE TIKTOK DEFENDANTS' MATERIALS SHOULD BE SEALED	
23		(MASTER COMPLAINT)	
24	I, Lexi Hazam, declare and state as follows:		
25	1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP and Co-Lead		
26	Counsel for Plaintiffs in this action. I am a member in good standing of the State Bar of		
27	California. I make this declaration based on my own personal knowledge. If called upon to		
28	testify, I could and would testify competently to the truth of the matters stated herein.		

1	2. I submit this declaration, as required by Civil Local Rule 7-11, regarding	
2	Plaintiffs' Administrative Motion Consider Whether the TikTok Defendants' Materials Should be	
3	Sealed.	
4	3. Plaintiffs' Master Complaint contains and refers to materials from the TikTok	
5	Defendants which Plaintiffs have agreed to treat as highly confidential until a protective order is	
6	entered by the Court and the TikTok Defendants have formally designated the materials under	
7	that protective order. Plaintiffs take no position at this time on whether any of the materials	
8	satisfy the requirements for filing under seal.	
9	4. As required by Civil Local Rule 79-5, Plaintiffs are filing redacted version of the	
10	Master Complaint on the public docket. Unredacted versions attached to this motion under seal	
11	contain highlighting to indicate where redactions are proposed.	
12	I declare under penalty of perjury that the foregoing is true and correct. Executed on	
13	February 14, 2023, in San Francisco, CA.	
14	<u>/s/ Lexi J. Hazam</u> Lexi J. Hazam	
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		